

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANU ALLEN.

Plaintiff,

VS.

CHANEL INC.,

Defendants.

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DECLARATION OF LORIE E. ALMON

LORIE E. ALMON, declares under penalty of perjury as follows:

1. I am a partner with the law firm of Seyfarth Shaw LLP, counsel to the Defendant in this case. I make this declaration based on my personal knowledge in support of Defendant Chanel, Inc.'s Motion to Dismiss Plaintiff's Complaint in the above-captioned action. I know the facts to which I testify in this Declaration to be true based on my own personal knowledge and/or a review of documents kept by Defendant in the regular course of its business.

2. Appended to this Declaration as **Exhibit A** is a true and correct copy of Plaintiff's Complaint in the above-referenced action.

3. Appended to this Declaration as **Exhibit B** is a true and correct copy of the Settlement and Release Agreement (“Release Agreement”) provided by Chanel, Inc. to Plaintiff, dated February 28, 2012.

4. Appended to this Declaration as **Exhibit C** is a true and correct copy of the Settlement and Release Agreement (“Altered Release Agreement”), signed by Plaintiff and dated March 19, 2012.

5. Appended to this Declaration as **Exhibit D** is a true and correct copy of a redline comparison of the Release Agreement and the Altered Release Agreement.

6. Appended to this Declaration as **Exhibit E** is a true and correct copy of Check No. 00455822 dated April 12, 2012 from Defendant to Plaintiff in the amount of \$14,940.19.

7. Pursuant to Fed. R. Civ. P. 5.2 and Local Rule 5-2.17, the required personal data identifiers have been redacted from the appended exhibits.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed this 12th day of November, 2012 at New York, New York.

/s/ Lorie E. Almon
Lorie E. Almon (LA-4937)